

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

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AMERICAN UNIVERSITY OF ANTIGUA –  
COLLEGE OF MEDICINE,

Petitioner,

v.

LEEWARD CONSTRUCTION COMPANY,  
LTD.,

Respondent.  
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Case No. 1:14-CV-08410-DLC/GWG  
Honorable Denise L. Cote  
United States District Judge

**NOTICE OF MOTION FOR AN  
ORDER OF ATTACHMENT AND  
PRELIMINARY INJUNCTION**

**PLEASE TAKE NOTICE** that petitioner American University in Antigua College of Medicine (“AUA”) shall move this Court, before the Honorable Denise L. Cote, United States District Judge, in Courtroom 15B of the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, on a date to be determined by the Court, for (1) an order of attachment pursuant to *Fed. R. Civ. P.* 64 and C.P.L.R. Articles 62 and 75 attaching respondent Leeward Construction Company, Ltd.’s (“Leeward”) interest in the Corrected Amended Judgment (the “First Judgment” or “Leeward’s Judgment”), entered on June 11, 2013, Docket No. 1:12-CV-06280 (Kaplan, J.), and the related *supersedeas* bond; and (2) a preliminary injunction pursuant to *Fed. R. Civ. P.* 65 enjoining Leeward from enforcing Leeward’s Judgment in violation of its Stay Agreement with AUA dated May 8, 2013.

**PLEASE TAKE FURTHER NOTICE** that in support of its motion AUA will rely on the accompanying Declaration of Leonard A. Sclafani and Memorandum of Law.

Respectfully submitted,

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By: /s/ James Hirschhorn  
JAMES HIRSCHHORN

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